

IN THE DISTRICT COURT IN AND FOR HASKELL COUNTY
STATE OF OKLAHOMA

LISA LANEIL LAWSON-SIRMON

Plaintiff,

v.

AMERICAN INCOME LIFE
INSURANCE COMPANY

Defendant.

Case No.: CV-11-38

Filed in the Office
of COURT CLERK
HASKELL COUNTY, OKLA.

OCT 31 2011

ROBIN RILEY, Court Clerk

Deputy

PETITION

COMES NOW, Lisa LaNeil Lawson-Sirmon and for her cause of action against the Defendant, American Income Life Insurance Company, would inform the Court as follows:

1. The Plaintiff is a resident of Haskell County, Oklahoma.
2. The Defendant is an insurance company that issued a life insurance policy insuring the life of John Sirmon.
3. John Sirmon died on August 5, 2010.
4. The autopsy shows that John Sirmon died as a result of acute combined drug toxicity.
5. The insurance company has been provided information that clearly shows that John Sirmon died as a result of taking propoxyphene and norpropoxyphene, both of which were prescription medications.
6. It is true that John Sirmon also had taken methadone, for which he did not have a prescription. However, information was provided to the insurance company which allowed it, based upon the autopsy report, the autopsy reports with all of its

EXHIBIT

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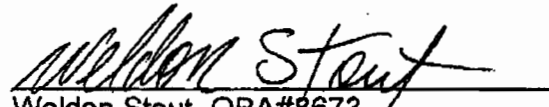
attachments and based upon pharmaceutical data that methadone in fact did not cause the death of John Sirmon.

7. American Income Life Insurance Company by a letter dated October 3, 2011, mailed October 6, 2011 denied the life insurance benefits it owed to John Sirmon's wife and family. This denial was wrongful, in violation of its contractual and good faith obligations to its insured.

WHEREFORE, based upon the above and foregoing, Plaintiff requests judgment against the Defendant for the policy benefits and for its wrongful and bad faith denial of the policy limit benefits as well as failure to adequately and properly investigate the claim, including damages for bad faith, punitive damages, attorney fees and such other and further relief as the Court and Jury may feel is reasonable and proper, all in an amount exceeding \$75,000.00.

Date: October 75, 2011.

Respectfully submitted,



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JURY TRIAL DEMANDED

ATTORNEY LIEN CLAIMED